

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X :
LYDIA ALEXANDRA COURI : 12-CV-2220 (TPG)(FM)

Plaintiff, :

vs. : **NOTICE OF MOTION**

McLAUGHLIN & STERN, LLP, and : **FOR SUMMARY JUDGMENT**
JON PAUL ROBBINS, ESQ., :

Defendants. : **ORAL ARGUMENT REQUESTED**
-----X :

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule of the Southern District of New York 56.1, that Defendants, McLAUGHLIN & STERN, LLP, and JON PAUL ROBBINS, ESQ., move this Court before Hon. Thomas P. Griesa, in the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date and time to be scheduled by the Court, for an Order granting the defendants summary judgment in their favor on all Causes of Action of the Complaint against them, and other further relief that the Court deems fair and just.

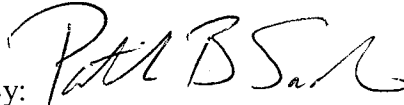
The reasons for this motion are set forth in detail in the accompanying Memorandum of Law in Support of Defendants' Motion For Summary Judgment, any reply papers which the defendants shall file and serve upon all counsel, the annexed Statement of Undisputed Material Facts Pursuant to Local Rule 56.1, the annexed Declaration of Patrick B. Sardino, Esq., dated March 13, 2014, together with the exhibits annexed thereto; the annexed Declaration of Jon Paul Robbins, Esq., together with the exhibits annexed thereto, and all pleadings and papers on file in the above-captioned matter; and

PLEASE TAKE FURTHER NOTICE that the Defendants request oral argument; and

PLEASE TAKE FURTHER NOTICE that any party opposing this motion must serve its opposition brief and any papers in support by April 4, 2014.

Dated: March 13, 2014
New York, New York

Respectfully submitted,

By: 

Patrick B. Sardino, Esq.
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